

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haeefe, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

October 19, 2021

The Honorable Sarah Netburn, U.S. Magistrate Judge
United States District Court for the S.D.N.Y.
Thurgood Marshall U.S. Courthouse, Room 430
40 Foley Square
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

The Plaintiffs' Executive Committees ("PECs") respond to the International Islamic Relief Organization's October 15, 2021 letter (ECF No. 7270), which responded substantively to the PECs' October 13, 2021 letter (ECF No. 7264), despite that the PECs made clear in their letter that we intended to meet and confer with IIRO, were not seeking relief from the Court at this time, and were merely bringing the potential dispute to the Court's attention.

With regard to IIRO's complaints about the timing of our submission notifying the Court of the potential issue, the PECs' only learned of the new evidence a few days before submission of their October 13 letter. Given that the Court previously had set an October 13 deadline for bringing to the Court's attention outstanding discovery issues with Mr. Kadi, the PECs viewed it prudent to call to the Court's attention by the same deadline the potential dispute with IIRO.

Given the PECs' intention to meet and confer with IIRO and that the PECs have not requested relief at this time, unless the Court directs the PECs to do so, the PECs do not intend to substantively address the IIRO's arguments, though the PECs view the arguments as misplaced.

Respectfully submitted,

COZEN O'CONNOR

MOTLEY RICE LLC

By: /s/ Sean P. Carter
SEAN P. CARTER

By: /s/ Robert T. Haeefe
ROBERT T. HAEFELE

The Honorable Sarah Netburn
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COZEN O'CONNOR
One Liberty Place
1650 Market Street, Suite 2800
Philadelphia, Pennsylvania 19103
Tel.: (215) 665-2105
Email: scarter@cozen.com
For the Plaintiffs' Exec. Committees

MOTLEY RICE LLC
28 Bridgeside Boulevard
Mount Pleasant, SC 29465
Tel.: (843) 216-9184
Email: rhafele@motleyrice.com
For the Plaintiffs' Exec. Committees

KREINDLER & KREINDLER LLP

By: /s/ Andrew J. Maloney
Andrew J. Maloney, III
KREINDLER & KREINDLER LLP
485 Lexington Avenue, 28th Fl
New York, NY 10017
Tel: 212-973-3438
Email: amaloney@kreindler.com
For the Plaintiffs' Exec. Committees

cc: The Honorable George B. Daniels, via ECF
All Counsel of Record via ECF